



February 16, 2022

VIA ECF

Hon. Naomi R. Buchwald
Daniel Patrick Moynihan
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *In re Aegean Marine Petroleum Network Inc. Sec. Litig.*, No. 18-CV-4993 (NRB)

To the Honorable Judge Buchwald:

Lead Plaintiff Utah Retirement Systems, on behalf of itself and each of the putative class members ("Lead Plaintiff"), and defendant Deloitte Certified Public Accountants, S.A. ("Deloitte Greece"), write jointly in connection with your honor's December 27, 2021 Order granting our application staying all proceedings and deadlines between said parties in the above-caption case through February 21, 2022 ("Stay"). This application was made because said parties reached a settlement to resolve the claims against Deloitte Greece and to allow Lead Plaintiff and Deloitte Greece to prepare and file a proposed settlement agreement and accompanying papers for preliminary approval of the partial settlement.

Lead Plaintiff and Deloitte Greece have been working diligently on negotiating the terms of the Settlement Agreement and accompanying exhibits. However, we are still negotiating the terms of the Stipulation of Settlement and its exhibits and working on the other papers. Moreover, as the Court is aware, Lead Plaintiff previously reached a settlement with PricewaterhouseCoopers Auditing Company S.A. ("PwC Greece"). Given the close proximity of the Deloitte Greece and PwC Greece settlements, Lead plaintiff, Deloitte Greece and PwC Greece believe it makes the most sense to move for both preliminary and final approval of both settlements at the same time. Accordingly, it will take some additional time to coordinate and finalize the proposed Class notice and other documents related to preliminary approval.

Accordingly, we jointly request an additional thirty-day extension on the Stay to Thursday, March 24, 2022, which will also serve as the deadline for Lead Plaintiff to file the motion and exhibits for preliminary approval.

*1 app for extension
Granted.
Naomi Reed-Buchwald,
USDT
2/17/22*

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Respectfully submitted,

BERMAN TABACCO

/s/ Joseph J. Tabacco, Jr.
Joseph J. Tabacco, Jr.
44 Montgomery Street, Suite 650
San Francisco, CA 94104
Telephone: (415) 433-3200
Facsimile: (415) 433-6382
Email: jtabacco@bermantabacco.com

*Counsel for Lead Plaintiff
Utah Retirement Systems*

ORRICK, HERRINGTON & SUTCLIFFE LLP

/s/ Thomas N. Kidera
Thomas N. Kidera
51 West 52nd Street
New York, NY 10019-6142
Telephone: (212) 506-5000
Facsimile: (212) 506 5151
Email: tkidera@orrick.com

– and –

Paul F. Rugani
701 5th Avenue
Suite 5600
Seattle, WA 98104
Telephone: (206) 839-4300
Email: prugani@orrick.com

*Counsel for Defendant Deloitte Certified Public
Accountants, S.A.*

cc: Michael Bongiorno
Wilmer Cutler Pickering
Hale and Dorr LLP
7 World Trade Center
250 Greenwich Street
New York, New York 10007